



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
CODEX COMMITTEE ON FRESH FRUITS AND VEGETABLES**

**16<sup>th</sup> Session  
Mexico City, Mexico, 2 – 6 May 2011**

Comments in reply to CL 2009/31-FFV on the Proposed Layout for Codex Standards for Fresh Fruits and Vegetables: Argentina, Switzerland and the United States of America

**ARGENTINA**

Argentina appreciates the opportunity to make the following comments on the Spanish text.

**SPECIFIC COMMENTS**

Regarding the Proposed Standard Layout for Codex Standards for Fresh Fruits and Vegetables, Argentina agrees with the general structure proposed for this text.

However, Argentina considers that Table in **Paragraph 8 “FOOD ADDITIVES”**, which makes reference to the INS number, Name of the Food Additive and Maximum Level, should be eliminated due to enter all information would be a hard and tedious work that certainly will be out of date in a short term.

Contrarily, Argentina considers appropriate to keep the two opening paragraphs where the General Standard in force for Food Additives, CODEX STAN 192-1995, is mentioned.

**SWITZERLAND**

**Proposed Layout for Codex Standards for Fresh Fruits and Vegetables**

**General comment:**

Switzerland considers this proposed standard layout as an opportunity to simplify the work of the Codex Committee on the development of new specific standards for fresh fruits and vegetables. The purpose of the proposed layout is to match the presentation and terminology, as well as, if need be, the dispositions of future international standards for fresh fruits and vegetables. As stated in the Codex Alimentarius Procedural Manual, the proposed layout for Codex Standards for Fresh Fruits and Vegetables must match that of the CEE-ONU, special care being taken to avoid double standards.

**Specific comments:**

**Section 1            Definition of produce**

During the 15th session of the Codex Committee on Fresh Fruits and Vegetables, it was agreed that the definition of produce must include the question concerning the place of application of the standards. The idea is to determine what dispositions are to be applied at the import/export control points.

Switzerland considers that it is essential to simplify and match the Codex standards applicable to fresh fruits and vegetables, in order to increase their acceptance by operators and decrease management costs for both operators and application authorities. The drawing up, however, of dispositions, particularly tolerances, differentiated according to application points, would make standards all the more complex and subject to interpretation.

Switzerland deems that the dispositions concerning tolerances already are flexible enough and take into account possible damages resulting from the duration of transportation. This is why it recommends maintaining the approach prevalent so far and consisting in defining tolerances applicable to both imports and exports controls.

**Section 3.1            Minimum requirements**

The proposed Layout for Codex Standards for Fresh Fruits and Vegetables mentions at page 5 footnote that: “This provision allows for smell caused by conservation agents used in compliance with corresponding regulations.” Switzerland therefore demands that this footnote be suppressed.

Switzerland deems that allowing for "conservation agents" for fresh fruits and vegetables is not compatible with the customers' legitimate expectations to obtain those products under the most natural conditions and healthiest presentation. Switzerland favors maintaining a restrictive approach toward conservation techniques leaving substances inside or on the surface of products, all the more so if they are likely to introduce strange flavors or odors, or modify the natural organoleptic qualities of the said products.

Furthermore, Switzerland wishes to stress that the notion: "corresponding regulations" is too ambiguous and should not be used in an international standard. Likewise, terms such as "conservation agents" are not related with the Codex General Standard for Food Additives. Their precise scope not having been specified, they introduce an element of confusion which should be avoided.

## Section 7 Provisions concerning marking or labeling

Switzerland wishes to stress the importance of precise and factual information to the consumer. The labeling of fresh fruits and vegetables must ensure sufficient information to the consumer, namely as to the nature and place of origin of the product, in order to warrant conditions allowing customers to make the wisest choice. Even the slightest possibility of deception must be banned.

**Subsection 7.1** of the standard layout refers to the "general provisions of the Codex General Standard for the Labelling of Prepackaged Foods". According to this Standard, declaration of country of origin is optional. However, the traceability of food items as well as the legitimate right of customers to information must be warranted by the requirement to exhibit certain information on the labels. Switzerland therefore demands to include in the standard layout project the mandatory mention of the country of origin of the produce, for both produce sold in bulk as well as for packages containing a mixture of varieties, commercial types or colors.

## Section 8 Food additives

Switzerland has reservations concerning the use of additives for fresh fruits and vegetables. Consumers are entitled to expect fresh fruits and vegetables to be free of extraneous substances. Furthermore, additives are not always free of undesirable effects, especially for particular population segments such as children, pregnant women or persons prone to allergies. Finally, there now exist alternative techniques allowing in most instances to do without additives, particularly for the preservation of fresh fruits and vegetables.

The use of additives may however be justified under certain circumstances, in which case Switzerland recommends to outline the conditions and limits on use for the food additives as part of the specific standards for the fresh produce considered; in which case Switzerland would favor the inclusion of a chart containing the denomination, conditions, and maximum limits on use of the additive.

## THE UNITED STATES OF AMERICA

The United States welcomes the opportunity to submit the following comments on the Proposed Layout for Codex Standards for Fresh Fruits and Vegetable (Alinorm 10/33/35-App.VII)

### General Comment

The United States fully supports the revision of the CCFFV Standard Layout. The CCFFV is encouraged to use this opportunity to not only revise and simplify the standard layout, but to develop a standard layout that will reflect trade practices while making the standard easier to apply.

### Specific Comments

#### 3. PROVISIONS CONCERNING QUALITY

The senescence process quickens in all fruits and vegetables immediately at harvest. Harvest and post harvest practices only slow down the process but do not halt it. Therefore, the standard should reflect this principle and allow for a margin of deterioration in quality at destination.

Some Codex member countries adopt the CCFFV standards as their national regulations, applying them within their domestic markets beyond the import control stage. Whereas exporters can only guarantee the quality of fresh fruits and vegetables at the import control stage, once domestic importers have taken possession of the imported product they are responsible for the quality. Consequently, Codex standards should reflect this trade practice.

To reflect this practice the United States proposes the following text language as an introductory paragraph to Section 3:

*The purpose of the standard is to define the quality requirements for {name of produce} at the export control stage after preparation and packaging. However, if applied at stages following export, products may show, in relation to the requirements of the standard:*

- *a slight lack of freshness and turgidity; and*
- *a slight deterioration due to their development and their tendency to perish (for products graded in classes other than the "Extra" Class).*

*In countries where this standard is applied throughout the domestic market, the holder/seller shall be responsible for observing such conformity.*

### 3.1 MINIMUM REQUIREMENTS

3.1.1 The *common name of the produce or part of the produce being standardized* [must have been carefully harvested/picked/etc.] and have reached an appropriate degree of development and ripeness in accordance with criteria proper to the variety [and/or commercial type], the time of [harvesting/picking/etc.] and to the area in which they are grown. The development and condition of the [common name of the produce or part of the produce being standardized] must be such as to enable them:

- to withstand transport and handling, and
- to arrive in satisfactory condition at the place of destination.
- .....

#### Comment:

1. The United States recommends that the underlined text in the opening paragraph of 3.1.1 "must have been carefully harvested/ picked etc" be deleted from the standard due to the following reasons:
  - I. The Definition of Produce clearly states the standard applies "to be supplied fresh to the consumer after preparation and packaging"; therefore harvest practices are excluded from the standard;
  - II. During application of the standard it is impossible to differentiate each cause of physical damage to the fruit; and
  - III. Codex FFV standards do not include handling requirements for harvest, post harvest, or transportation.
2. The second indent, which reads: "to withstand transport and handling," gives the impression that the product must in somehow withstand the means of transportation and not the process. In view of this, it is recommended that "transport" be replaced by "transportation."

### 3.2 CLASSIFICATION

**Comment:** The entire text of this section from 3.2.1 to 3.2.3 is very normative and open to different interpretation from that of Codex fresh fruit and vegetable standards among Codex Member countries. This section on classification must be directly linked to the "Provisions Concerning Tolerances"- for the classes are judged by the latter section. Therefore, the following simplified text is proposed:

#### 3.2 CLASSIFICATION

*In accordance with the defects allowed in section 5. "PROVISIONS CONCERNING TOLERANCES", the (name of product) are classified into the following classes:*

*"Extra Class", "Class I", "Class II".*

*The defects allowed must not affect the general appearance of the produce as regards quality, keeping quality and presentation in the package.*

### 5. PROVISIONS CONCERNING TOLERANCES

**Comment:** This section "Provision Concerning Tolerances" must be based on the Section 3.1. "Minimum Requirements"- which indicate the parameters for defects allowed and Section 5.2 Size Tolerances. Tolerances should set the total defects for each class and within this total tolerance, the maximum tolerance for each individual defects identified in Section 3.1- Minimum Requirements.

Due to the perishable nature of fresh fruits and vegetables, the CCFV should consider setting different tolerances for the shipping point and at destination, for defects not visible or present at the shipping point may become visible or be manifested at the destination due to factors that result in quality deterioration during transportation.

Decay and internal breakdown occur in fruits and vegetables irrespective of the best efforts of producers, packers, exporters and other distribution service providers. Therefore, it is impossible to guarantee the wholesomeness of every individual fruit and vegetable packaged.

Hence, the following format is proposed for this section:

#### [5. PROVISIONS CONCERNING TOLERANCES]

Tolerances in respect of quality and size are allowed in each lot for produce not satisfying the minimum requirements of the class indicated.

**A. Quality tolerances**

Defects Allowed <sup>1</sup>	Tolerances allowed percentage of defective produce by count or weight otherwise specified		
	Extra Class	Class I	Class II
(a) Total Tolerances for produce not satisfying the minimum requirements: Of which no more than; - Damaged fruit Bruising (fresh and/or healed) Pitting Shriveling Sunburn Stem-end Rot Cracked /cut skin (penetrating the flesh) (not penetrating the flesh) - Unclean Dirt/Dirty Latex Stains - Insufficiently Developed Immature Misshapen - Over ripe/developed Soft - Damage by pest Living Dead Frass/excreta - Decay and internal breakdown	<b>5%</b>	<b>10%</b>	<b>10%</b>
(b) Size Tolerance	10	10	10

<sup>1</sup> The defects allowed will vary based on the characteristics of the fresh fruit or vegetable being standardized.